UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AU NEW HAVEN, LLC, and TRELLEBORG COATED SYSTEMS US, INC., Plaintiffs, v. YKK CORPORATION, et al., Defendants.	Civil Action No. 15-CV-03411 (GHW) **DEFENDANTS' NOTICE OF MOTION TO DISMISS PORTIONS OF PLAINTIFFS' AMENDED COMPLAINT** **Oral Argument Requested**

TO: All Counsel of Record for Plaintiffs

PLEASE TAKE NOTICE that the undersigned attorneys for Defendants ("YKK") hereby move before the United States District Court for the Southern District of New York, the Honorable Gregory H. Woods, presiding, for an Order declining to exercise jurisdiction over the foreign patents Plaintiffs have added to this litigation and thereby dismissing those portions of Plaintiffs' Amended Complaint which rely upon those foreign patents.

PLEASE TAKE FURTHER NOTICE that in support of this motion, YKK shall rely on the pleadings and proceedings herein and upon YKK's Memorandum in Support of such motion, including the exhibit attached thereto.

PLEASE TAKE FURTHER NOTICE that YKK requests that the Court schedule oral argument on this motion.

March 11, 2016
New York, New York

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on March 11, 2016, per Local Rule Civil Rule 5.2.

/s/ Frederick L. Whitmer
Frederick L. Whitmer